

# BAKER BOTTS LLP

ONE SHELL PLAZA  
910 LOUISIANA  
HOUSTON, TEXAS  
77002-4995

TEL +1 713.229.1234  
FAX +1 713.229.1522  
BakerBotts.com

AUSTIN	LONDON
BEIJING	MOSCOW
BRUSSELS	NEW YORK
DALLAS	PALO ALTO
DUBAI	RIO DE JANEIRO
HONG KONG	RIYADH
<b>HOUSTON</b>	WASHINGTON

February 27, 2015

Scott Janoe  
TEL: 7132291553  
FAX: 7132297953  
scott.janoe@bakerbotts.com

VIA CERTIFIED MAIL AND EMAIL

Kathleen H. Johnson  
Director, Enforcement Division  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, CA 94105

Re: Second Response of Halliburton Energy Services Inc. to the January 27, 2015  
Request for Information Pursuant to Section 114 of the Clean Air Act Regarding  
Compliance with California Air Resource Board's Truck and Bus Regulation

Dear Ms. Johnson:

Attached to this letter is the second response of Halliburton Energy Services Inc. ("Halliburton") to the above-referenced request.

Pursuant to the schedule agreed to on February 13, 2015, Halliburton provided an initial response to Questions 1-6 on February 18, 2015. This second response addresses Question 7, regarding Halliburton's compliance with the Truck and Bus Regulation phase-in schedule. A third response regarding trucks hired or dispatched will be provided by March 6, 2015.

Halliburton is continuing to search its files for responsive information and anticipates providing additional responses according to the schedule described above. If you have any questions about this cover letter or the enclosed attachment, please contact me at [scott.janoe@bakerbotts.com](mailto:scott.janoe@bakerbotts.com) or 713.229.1553.

Very truly yours,

A handwritten signature in black ink, appearing to read "Scott Janoe", written over a horizontal line.

Scott Janoe

cc: Janice Chan, ENF-2-1, U.S. EPA Region 9

**SECOND RESPONSE OF HALLIBURTON ENERGY SERVICES INC. TO JANUARY 27, 2015 REQUEST**

---

7. *In Halliburton's Response Letter, the response to Request 2 states that the compliance date for its fleet is January 1, 2016. Please provide:*
- a) *The basis for Halliburton's position (including any relevant legal citations), and*
  - b) *The schedule of activities that have been conducted or will be conducted in the future to achieve compliance for the vehicles in its fleet.*

Under Section 2025(i) of the Truck and Bus Regulation, fleet owners of regulated vehicles may comply with the regulation pursuant to an alternate phase-in schedule.

As of the most recent compliance date, January 1, 2015, Halliburton's California fleet consisted of 155 regulated vehicles. 151 vehicles, or 98% of Halliburton's California fleet, met the PM BACT requirements. 119 of those vehicles are vehicles with engines equipped with an original equipment manufacturer diesel particulate filter ("DPF") or are vehicles with engine model years of 2010, 2011, or 2012. 32 of these vehicles have an engine that was retrofitted to meet the PM BACT requirements of the Truck and Bus Regulation. Halliburton has indicated the dates of the DPF installations in the Excel spreadsheet accompanying its November 7, 2014 response to the June 16, 2014 information request

Of the four remaining regulated vehicles, three vehicles (VINs 1XKDDT9X75R086552, 1NK0L99X7XR815005, and 1XKWDB9X87J179455) are no longer used in California and are no longer part of Halliburton's California fleet. The fourth vehicle, VIN 2HTFBA6T1RC086696, is not currently operating. By January 1, 2016, Halliburton will either retrofit the engine of this vehicle with a DPF or replace this vehicle with another unit that meets the PM BACT requirements. Thus, by January 1, 2016, Halliburton's California fleet will be at 100% compliance with the PM BACT requirements of the Truck and Bus Regulation.